

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR
SYSTEMS PRODUCTS LIABILITY
LITIGATION

Master File No. 2:12-MD-02327
MDL 2327

ETHICON WAVE 5 CASES LISTED IN
EXHIBIT A

JOSEPH R. GOODWIN U.S. DISTRICT
JUDGE

**NOTICE OF ADOPTION OF PRIOR DAUBERT MOTION OF
TERESA IRWIN, M.D. FOR WAVE 5**

Comes now, the Plaintiffs, and hereby adopt and incorporate by reference the Daubert motion filed against Teresa Irwin for Ethicon Wave 1, Dkt. 2006 (motion), 2008 (memorandum in support). Plaintiffs respectfully request that the Court exclude Teresa Irwin's testimony, for the reasons expressed in the Wave 1 briefing. This notice applies to the following Wave 5 cases identified in Exhibit A attached hereto.

Dated: August 15, 2017

Respectfully submitted,

/s/ D. Renee Baggett
Bryan F. Aylstock, Esq.
Renee Baggett, Esq.
Aylstock, Witkin, Kreis and Overholtz, PLC
17 East Main Street, Suite 200
Pensacola, Florida 32563
(850) 202-1010
(850) 916-7449 (fax)
E-mail: rbaggett@awkolaw.com

/s/ Thomas P. Cartmell
THOMAS P. CARTMELL
Wagstaff & Cartmell LLP
4740 Grand Avenue, Suite 300
Kansas City, MO 64112
816-701-1102
Fax 816-531-2372
tcartmell@wcllp.com

EXHIBIT A

Eason, Carla	2:12-cv-07909
Lenderman, Mary	2:12-cv-06216
Dupont, Catherine	2:12-cv-07490
Roberts, Rebecca	2:12-cv-07272
Valverde, Jodi	2:12-cv-07999

CERTIFICATE OF SERVICE

I hereby certify that on August 15, 2017, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ D. Renee Baggett
D. RENEE BAGGETT
Aylstock, Witkin, Kreis and Overholtz, PLC
17 E. Main Street, Suite 200
Pensacola, FL 32563
850-202-1010
850-916-7449
Rbaggett@awkolaw.com